Rockford
Cold Formed Products

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F.O.S

Bill Naill
Executive Vice President of Manufacturing

August 6, 1986

Illinois Environmental Protection Agency
4302 North Main Street
Rockford, Illinois 61105

Re: Tank Containment Area Plant 2 Report

Gentlemen:

This report is being prepared after meeting on July 31, 1986 with Robert Wengrow, Patricia Luedke and Jock Holzer from Region I, I.E.P.A. and Larry Hammond, Consultant, representing Rockford Products Corporation.

Five items were discussed on agenda which are to be answered and forwarded to Region I, I.E.P.A. office, by 8/8/86. Item I "Description of Soil Samples Taken, Location and Results of Analysis".

On July 7, 1986 (4) samples were taken from the containment area. They were marked A, B, C, and D and are marked on a print prepared by J. Robert Lofton, Architect, drawn 9/11/80. Sample A, B and D were soil samples from around tanks and lower elevation of containment area. Sample C was taken as a comparison sample. Analytical report from Aqua-Lab is enclosed marked "Exhibit I".

Item 2, "Physical Description of the Containment Area".

A construction print prepared by J. Robert Lofton, Architect, marked "Exhibit II" is enclosed. Added are soil sample locations and area of containment with concrete floor.

Item 3, "Estimate (Theory) of How Contamination Occurred, Extent and Quality of Contamination".

The three upright tanks were installed in the 1940's. The horizontal tank was installed in the early 1970's.

Tank levels were measured weekly by attaching a glass measuring tube to the bottom of tanks and observing the level of oil in glass tube. When measurement is complete,

August 6, 1986

To: Illinois Environmental Protection Agency

tank valve is shut off and measuring tube removed. It is at this time when oil spillage could and probably did occur.

Another possibility of contamination would be for an employee or contract worker to dump oils, hazardous organics or cleaners after using.

The extent of contamination seems to be confined to area around upright tanks.

Four organics are present on analysis sheets marked "Exhibit I". Of the four, (Toluene) is the only organic of record purchased by Rockford Products Corporation. Toluene was used as paint thinner and cleaner for building and machinery painting.

Xylene 12800 NG/G Toluene 970 NG/G and Tetrachloroethene 775 NG/G have the highest concentrations of contaminants in the immediate tank area.

Item 4, "Plans for Removal of Contaminated Soils and Prevention of Further Occurrence".

Rockford Products Corporation would plan to remove between 25 and 27 yards of soil and haul to special or hazardous waste landfill, then cover entire area with a 4" wire reinforced concrete floor with a catch sump at lowest elevation. Also, a weekly inspection log of containment area would be filled out and kept for future S.P.C.C. and E.P.A. inspections.

Item 5, "The Plan Will Also Make a Hazardous Waste Determination of the Contaminated Soils".

After reviewing sample analysis from Aqua-Lab, it appears that the highest concentrations of Xylene, Toluene, Benzene and Tetrachloroethene were in sample "A", or at north end of soil around tanks. (See print Exhibit II). A concrete floor starts immediately north of sample area to building north wall. It would appear that any contaminate from concrete floor area would run on to soil near sample "A". Also, the 3 upright and 1 horizontal tanks have been painted within the past 6 months. The painting contractor confirmed the presence of Xylene in paint used on tanks. Cleaners and thinners may have contained Benzene,

August 6, 1986

To: Illinois Environmental Protection Agency

Toluene and Tetrachloroethene, but could not get a positive confirmation from contractor.

By removing 25 yds. of soil around tanks and placing a concrete cap over area should make area safe from any further contamination. Concentrations of contaminants should remain in tank area due to 4 foot footings and wall constructed in November 1980 for S.P.C.C. containment plan, (See Exhibit Map II).

After removing soil, 3 samples would be taken in highest contaminated area for Xylene, Benzene, Toluene and Tetrachloroethene and forwarded to Region I, I.E.P.A. office.

This concludes report. Rockford Products Corporation will try to answer any future questions that may arise after examination by I.E.P.A. personnel.

Sincerely,

Bill Niell

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